



Jacqueline M. Arango

Application GRANTED. The Clerk of Court is
directed to terminate Doc. #171. SO ORDERED.

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A handwritten signature in black ink, appearing to read "Jacqueline M. Arango".

December 29, 2023

December 27, 2023

VIA CM/ECF

Honorable Jesse M. Furman, District Judge
United States District Court, Southern District of New York
Thurgood Marshall, United States Courthouse
40 Foley Square
New York, NY 10007

**Re: USA v. Winkelbauer, et al., USDC, Southern District of New York
Case No. 23-cr-133-JMF**

Dear Judge Furman:

We represent Fabiola Cino in the above-referenced matter. We respectfully request a change of Ms. Cino's bond conditions to include travel to Lima, Peru from January 12 – 26, 2024 to attend to her parents whom are both in their late 80's and in poor health. Her mother suffers from Alzheimer's and her condition is deteriorating. As part of the bond modification, Ms. Cino would need her U.S. Passport to be returned to her temporarily by Pre-Trial Services prior to her trip. Upon her return from Lima, Peru, she will surrender her passport back to Pre-Trial Services.

Ms. Cino's travel is restricted to the Eastern and Western Districts of Virginia, Southern District of Florida, District of Maryland, District of Columbia and New York. Accordingly, we respectfully request that Ms. Cino's bond be modified to include Lima, Peru to the list of locations where Ms. Cino is permitted to travel for this trip.

We have conferred with AUSA Danielle Kudla and Pre-Trial Services Officer Nicole Andrews, who are copied here, and they have confirmed that they have no objection to this request. Additionally, we have provided the AUSAs with Ms. Cino's parents' medical records confirming their ages and medical conditions. We will provide the AUSAs on this matter with Ms. Cino's travel itinerary, the address of where she will stay in Lima, Peru, and any other trip information that is requested.

Sincerely,

/s/ Jacqueline M. Arango

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